

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA COURT  
FILE NO. 06-1016 DSD/SRN**

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**Jacob John Kenfield,**

**Plaintiff,**

**vs.**

**RULE 26(a)(2) DISCLOSURES  
OF PLAINTIFF, JACOB KENFIELD**

**Wrecker Services, Inc., John Does 1-3,**

**Robert J. Kroll, and The City of Minneapolis,**

**Defendants.**

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TO: DEFENDANTS ROBERT J. KROLL AND THE CITY OF MINNEAPOLIS AND THEIR ATTORNEYS TIMOTHY S. SKARDA AND TRACEY L. NELSON, OFFICE OF THE MINNEAPOLIS CITY ATTORNEY, 333 SOUTH SEVENTH STREET, SUITE 300, MINNEAPOLIS, MN 55402-2453.

DEFENDANT WRECKER SERVICES, INC. AND THEIR ATTORNEY, CHARLES J. NOEL, 860 BLUE GENTIAN ROAD, SUITE 180, EAGAN, MN 55121

**INTRODUCTORY STATEMENT**

The following disclosures of expert testimony are made based on the information reasonably available to the Plaintiff as of the date hereof. Plaintiffs' disclosures represent a good faith effort to identify information he reasonably believes he may use to support his claim.

**Disclosure of Expert Testimony, Rule 26(a)(2)(A)**

Plaintiff, John Jacob Kenfield, hereby makes the following Federal Rules of Civil Procedure, Rule 26(a)(2)(A) Disclosures of Expert Testimony:

Plaintiff intends to call each of this treating physicians to testify to their observations of the Plaintiff's physical condition, their assessment of his injuries, diagnosis of his condition, treatment, prognosis, and recommendations for any future medical treatment that may be reasonably necessary to cure or relieve the effects of his injuries. They will also testify to the reasonable costs of past medical care and projected cost of future treatment, if any.

Plaintiff is still in the process of collecting medical records and identifying the physicians and therapists that have rendered treatment to the plaintiff. More detailed identification of the individual practitioners including their curricular vitae will be supplemented promptly.

These medical care witnesses may rely upon one or more of the following documents:

Photographs of Jacob John Kenfield taken at Hennepin County Medical Center.

The Deposition of Robert J. Kroll.

Hennepin County Medical Center medical records.

Edina Eye Physicians medical records.

Minneapolis Police Department Report and file for Case No. MP04034881.

**Disclosure of Expert Testimony, Rule 26(a)(2)(B)**

Plaintiff, John Jacob Kenfield, hereby makes the following Federal Rules of Civil Procedure, Rule 26(a)(2)(B) Disclosures of Expert Testimony:

Plaintiff does not anticipate calling any witness whose expert testimony is contemplated under Federal Rule 26(a)(2)(B). If the need for such a witness shall appear to be reasonably necessary as discovery progresses, Plaintiff will promptly identify any such witness and provide the required disclosures required by this rule. Plaintiff has not retained or specially employed any expert witness contemplated by this rule.

The Plaintiff respectfully makes this disclosure based on information reasonably available to him at this time. Plaintiff will supplement this disclosure when appropriate.

Dated: 10-1-06

HEUER & ASSOCIATES, P.A.



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Attorney for Plaintiff